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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: VOLKSWAGEN “CLEAN
DIESEL” MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

MDL No. 2672 CRB (JSC)

**STIPULATION AND ~~PROPOSED~~ ORDER
TO ADJOURN INITIAL CASE STATUS
CONFERENCE**

This Document Relates To:

Judge: Hon. Charles R. Breyer

U.S. S.E.C. v. Volkswagen AG,
No. 3:19-cv-1391-CRB

This Stipulation is entered into between Defendant Martin Winterkorn (“Winterkorn”), Defendants Volkswagen Aktiengesellschaft, Volkswagen Group of America Finance, LLC, and VW Credit, Inc. (“Defendants”), and Plaintiff United States Securities and Exchange Commission (together with Defendants, the “Parties”).

1 WHEREAS, on March 21, 2019 the Court issued an order scheduling an initial case status
 2 conference in this action for April 23, 2019 at 10:30 a.m. and a deadline for the parties to submit a
 3 joint written statement in advance of that conference by April 17, 2019;

4 WHEREAS, lead counsel for Defendant Winterkorn is unable to attend a status conference
 5 on April 23, 2019 because of a scheduled oral argument in another, unrelated, matter;

6 WHEREAS, the Parties agree that the status conference should be rescheduled; and

7 WHEREAS, the Parties have conferred together and with the Court's Courtroom Deputy
 8 Clerk, and have confirmed that the Parties and the Court are available on May 10, 2019 at 10:00
 9 a.m.;

10 NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and among the
 11 Parties, that, subject to the Court's approval, the initial case management conference shall be
 12 adjourned to May 10, 2019 at 10:00 a.m., when it will be held in Courtroom 6 of the United States
 13 District Court for the Northern District of California, located at 450 Golden Gate Avenue, San
 14 Francisco, CA 94102-3489;

15 IT IS FURTHER AGREED, that, subject to the Court's approval, the deadline for the parties
 16 to submit a joint written statement shall be adjourned to May 3, 2019; and

17 IT IS FURTHER AGREED THAT by entering into this stipulation the Defendants do not
 18 waive any of their defenses in this action, including, without limitation, defenses regarding personal
 19 jurisdiction and service;

20 Date: April 3, 2019

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 23
 24 /s/Christopher J. Stanley
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*Attorneys for Plaintiff United States Securities
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PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: April 8, 2019



CHARLES R. BREYER

United States District Judge

ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: April 3, 2019

JOSEPH HAGE AARONSON LLC

/s/Christopher J. Stanley
Christopher J. Stanley (*pro hac vice*)